

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
<i>Plaintiff,</i>	)	
	)	
vs.	)	
	)	
TIMOTHY CALLAHAN, FRANCIS M.	)	
ROACHE, PATRICIA MURPHY, <i>as Executrix</i>	)	
<i>of the Estate of</i> PAUL MURPHY,	)	
RICHARD WALSH, and	)	
THE CITY OF BOSTON,	)	
<i>Defendants.</i>	)	


**DEFENDANTS' MOTION TO SEAL EXHIBITS  
ATTACHED TO THEIR JOINT RESPONSE TO PLAINTIFF'S MOTION  
TO REAFFIRM PROTECTIVE ORDER AND REQUEST FOR CLARIFICATION**

NOW COME the Defendants, Richard Walsh, Timothy Callahan, Francis M. Roache, and Patricia Murphy, *as Executrix of the Estate of Paul Murphy* (collectively "Defendants"), and hereby request that this Honorable Court seal the exhibits attached to their Joint Response to Plaintiff's Motion to Reaffirm Protective Order and Request for Clarification, and its supporting memorandum and exhibits. As grounds in support herein, the Defendants state that the documents should be sealed to prevent prejudicial pretrial publicity, to protect the privacy interests of third parties. *See U.S. v. Salemme*, 985 F.Supp. 193, 195 (D.Mass. 1997). As further grounds, Defendants hereby file exhibits under seal pursuant to the Protective Order entered by this Court.

WHEREFORE, the Defendants respectfully requests this Honorable Court allow the Exhibit in support of Defendants' Response to Plaintiff's Motion to Reaffirm Protective Order and Request for Clarification be filed under seal.

Respectfully submitted,

**Defendant Richard Walsh,**  
Through His Attorneys,

  
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Through his Attorneys,

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**Defendant, Patricia Murphy, as Executrix  
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**Defendant, Timothy Callahan**  
Through his Attorneys,

/s/ MaryJo Harris, Esq.  
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**CERTIFICATE OF SERVICE**

I, Hugh R. Curran, hereby certify that a copy of the foregoing document was mailed, this 13<sup>th</sup> day of February, 2007 to all counsel of record:

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